

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

OCT -31 P 2:19

STEPHEN C. DRIES
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROMELL R. LEWIS,

Defendant.

17-CR-168

Case No. 17-CR

[18 U.S.C. §§ 922(g)(1), 924(a)(2) &
924(c); 21 U.S.C. §§ 841(a)(1) &
841(b)(1)(D)]

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about August 14, 2017, in the State and Eastern District of Wisconsin,

ROMELL R. LEWIS,

who previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed three firearms which, prior to his possession of them, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearms are more fully described as:

- a. a Springfield Armory, model 1911A-1, .45 caliber pistol, bearing serial number WW128948;
- b. a Sig-Sauer, model SP2022, .40 caliber pistol, bearing serial number 24B015976; and
- c. a Volunteer Enterprises, model Commando Mark III, .45 caliber rifle, bearing serial number 24893.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 14, 2017, in the State and Eastern District of Wisconsin,

ROMELL R. LEWIS

knowingly and intentionally possessed with intent to distribute a mixture and substance containing marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 14, 2017, in the State and Eastern District of Wisconsin,

ROMELL R. LEWIS

knowingly possessed three firearms in furtherance of the drug trafficking offense charged in Count

Two of this Indictment, to wit:

- a. a Springfield Armory, model 1911A-1, .45 caliber pistol, bearing serial number WW128948;
- b. a Sig-Sauer, model SP2022, .40 caliber pistol, bearing serial number 24B015976; and
- c. a Volunteer Enterprises, model Commando Mark III, .45 caliber rifle, bearing serial number 24893.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

FORFEITURE NOTICE

Upon conviction of the offense in violation of Title 18, United States Code, Section 922(g) set forth in Count One of this Indictment and/or the offense in violation of Title 18, United States Code, Section 924(c) set forth in Count Three of this Indictment, the defendant, Romell R. Lewis, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition, involved in the offenses of conviction, including, but not limited to:

- a. a Springfield Armory, model 1911A-1, .45 caliber pistol, bearing serial number WW128948;
- b. a Sig-Sauer, model SP2022, .40 caliber pistol, bearing serial number 24B015976; and
- c. a Volunteer Enterprises, model Commando Mark III, .45 caliber rifle, bearing serial number 24893.

A TRUE BILL:


FOREPERSON *J*

Date: 10-3-17

Kelly D. Haanstad
For GREGORY J. HAANSTAD
United States Attorney